

ORIGINAL FILED

MAR 18 2021

MICHAEL J. KILLIAN  
FRANKLIN COUNTY CLERK  
Xqj

CIVIL

FRANKLIN

COUNTY SUPERIOR COURT

21 250126 11 Case Information Cover Sheet (CICS)

Case Number Case Title GARD v. GREYHOUND LINES, INC.

Attorney Name Tamara Baldwin Bar Membership Number 50077

Please check one category that best describes this case for indexing purposes. Accurate case indexing not only saves time in docketing new cases, but helps in forecasting needed judicial resources. Cause of action definitions are listed on the back of this form. Thank you for your cooperation.

Form updated 12/28/2020

- |  |  |
|--|--|
| <input type="checkbox"/> ABJ Abstract of Judgment                            | <input type="checkbox"/> PRG Property Damage – Gangs                     |
| <input type="checkbox"/> ABL Abusive Litigation                              | <input type="checkbox"/> PRP Property Damages                            |
| <input type="checkbox"/> ALR Administrative Law Review                       | <input type="checkbox"/> QTI Quiet Title                                 |
| <input type="checkbox"/> ALRJT Administrative Law Review-Jury Trial (L&I)    | <input type="checkbox"/> RDR Relief from Duty to Register                |
| <input type="checkbox"/> BAT Ballot Title                                    | <input type="checkbox"/> RFR Restoration of Firearm Rights               |
| <input type="checkbox"/> CHN Non-Confidential Change of Name                 | <input type="checkbox"/> SDR School District-Required Action Plan        |
| <input type="checkbox"/> CBC Contractor Bond Complaint                       | <input type="checkbox"/> SER Subdivision Election Process Law Review     |
| <input type="checkbox"/> COL Collection                                      | <input type="checkbox"/> SPC Seizure of Property-Commission of Crime     |
| <input type="checkbox"/> CON Condemnation                                    | <input type="checkbox"/> SPR Seizure of Property-Resulting from Crime    |
| <input type="checkbox"/> COM Commercial                                      | <input type="checkbox"/> STK Stalking Petition                           |
| <input type="checkbox"/> CRP Pet. for Cert. of Restoration of Opportunity    | <input type="checkbox"/> SXP Sexual Assault Protection                   |
| <input type="checkbox"/> DOL Appeal Licensing Revocation                     | <input type="checkbox"/> TAX Employment Security Tax Warrant             |
| <input type="checkbox"/> DVP Domestic Violence                               | <input type="checkbox"/> TAX L & I Tax Warrant                           |
| <input type="checkbox"/> EOM Emancipation of Minor                           | <input type="checkbox"/> TAX Licensing Tax Warrant                       |
| <input type="checkbox"/> FJU Foreign Judgment                                | <input type="checkbox"/> TAX Revenue Tax Warrant                         |
| <input type="checkbox"/> FOR Foreclosure                                     | <input type="checkbox"/> TMV Tort – Motor Vehicle                        |
| <input type="checkbox"/> FPO Foreign Protection Order                        | <input type="checkbox"/> TRJ Transcript of Judgment                      |
| <input type="checkbox"/> HAR Unlawful Harassment                             | <input checked="" type="checkbox"/> TTO Tort – Other                     |
| <input type="checkbox"/> INJ Injunction                                      | <input type="checkbox"/> TXF Tax Foreclosure                             |
| <input type="checkbox"/> INT Interpleader                                    | <input type="checkbox"/> UND Unlawful Detainer – Commercial              |
| <input type="checkbox"/> LCA Lower Court Appeal – Civil                      | <input type="checkbox"/> UND Unlawful Detainer – Residential             |
| <input type="checkbox"/> LCI Lower Court Appeal – Infractions                | <input type="checkbox"/> VAP Vulnerable Adult Protection Order           |
| <input type="checkbox"/> LUPA Land Use Petition Act                          | <input type="checkbox"/> VEP Voter Election Process Law Review           |
| <input type="checkbox"/> MAL Other Malpractice                               | <input type="checkbox"/> VVT Victims of Motor Vehicle Theft-Civil Action |
| <input type="checkbox"/> MED Medical Malpractice                             | <input type="checkbox"/> WDE Wrongful Death                              |
| <input type="checkbox"/> MHA Malicious Harassment                            | <input type="checkbox"/> WHC Writ of Habeas Corpus                       |
| <input type="checkbox"/> MSC2 Miscellaneous – Civil                          | <input type="checkbox"/> WMW Miscellaneous Writs                         |
| <input type="checkbox"/> MST2 Minor Settlement – Civil (No Guardianship)     | <input type="checkbox"/> WRM Writ of Mandamus                            |
| <input type="checkbox"/> PCC Petition for Civil Commitment (Sexual Predator) | <input type="checkbox"/> WRR Writ of Restitution                         |
| <input type="checkbox"/> PFA Property Fairness Act                           | <input type="checkbox"/> WRV Writ of Review                              |
| <input type="checkbox"/> PIN Personal Injury                                 | <input type="checkbox"/> XRP Extreme Risk Protection Order               |
| <input type="checkbox"/> PRA Public Records Act                              | <input type="checkbox"/> XRU Extreme Risk Protection Order Under 18      |

IF YOU CANNOT DETERMINE THE APPROPRIATE CATEGORY, PLEASE DESCRIBE THE CAUSE OF ACTION BELOW

Please Note: Public information in court files and pleadings may be posted on a public Web site.

FILED

MICHAEL J. KILLIAN,  
COUNTY CLERK

03/18/2021

BY XYL, DEPUTY

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR FRANKLIN COUNTY

KAREN ELAINE GARD  
Plaintiff/Petitioner(s),

vs.

GREYHOUND LINES, INC  
Defendant/Respondent(s).

No. 21-2-50126-11

**CIVIL CASE SCHEDULE ORDER  
(ORSCS)**

I. SCHEDULE

\*\*\*All **Court Hearing** dates are currently suspended. A new schedule will be issued once Emergency Orders are modified or lifted\*\*\*

	DUE DATE
1. Cancellation / Confirmation of Status Conference.....	3 Months
2. <b>Status Conference</b> .....	<b>TBD</b>
3. Plaintiff's Disclosure of Lay and Expert Witnesses.....	4 Months
4. Defendant's Disclosure of Lay and Expert Witnesses.....	6 Months
5. Last Date for Filing Statement of Arbitrability.....	6.5 Months
6. Disclosure of Plaintiff's Rebuttal Witnesses.....	6.5 Months
7. Disclosure of Defendant's Rebuttal Witnesses.....	7 Months
8. Discovery Completed.....	9.5 Months
9. Last Date for Filing Jury Demand.....	10 Months
10. Settlement Position Statements filed by all parties.....	10 Months
11. Last Date for Hearing Dispositive Pretrial Motions.....	10.5 Months
12. <b>Settlement Conference</b> .....	<b>TBD</b>
13. Last Date for Filing and Serving Trial Management Report.....	11.5 Months
14. <b>Pretrial Management Conference</b> .....	<b>TBD</b>
15. Trial Memoranda and Motions in Limine to be filed.....	2 Weeks to Trial
16. <b>Trial Date and Motions in Limine</b> .....	<b>TBD</b>

II. ORDER

This Order is entered for Administrative purposes. All parties need not comply with the deadlines.

Dated this 18th day of March, 2021.

CARRIE L. RUNGE  
SUPERIOR COURT JUDGE/COMMISSIONER

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**MAR 18 2021**

**MICHAEL J. KILLIAN  
FRANKLIN COUNTY CLERK**

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF FRANKLIN**

Karen Elaine Gard

Plaintiff,

v.

Greyhound Lines, Inc.,

Defendant.

Case No.: **21 250126 11**

**SUMMONS**

**THE STATE OF WASHINGTON, COUNTY OF FRANKLIN TO The Agent For**

**Greyhound Lines, Inc.:**

A lawsuit has been started against you in the above-entitled court by the above named plaintiff. Plaintiff's claims are stated in the written Complaint, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your defense(s) in writing, and serve a copy upon the undersigned attorney for the plaintiffs within twenty (20) days after the services of this summons, excluding the day of service, if served within the State of Washington, or within sixty (60) days after service of this summons upon you, excluding the day of service if served out of the State of Washington, or a default judgment may be entered against you without notice. A default judgment is one where the plaintiffs are entitled to what they ask for because you have not responded. If you serve a notice of appearance on the undersigned attorney, you are entitled to notice before a default judgment may

**SUMMONS**

Parke Gordon, LLC  
7401 W. Hood Place, Suite 208  
Kennewick, WA 99336  
Tel (509) 582-7274  
Fax (866) 472-0506

1 be entered.

2 You may demand that the plaintiff file this lawsuit with the court. If you do so, the  
3 demand must be in writing and must be served upon the plaintiff. Within fourteen (14) days  
4 after you serve the demand, the plaintiffs must file this lawsuit with the court, or the service on  
5 you of this summons and complaint will be void.

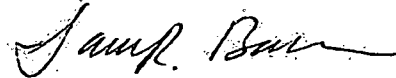
6 If you wish to seek the advice of an attorney in this matter, you should do so promptly so  
7 that your written responses, if any, may be served on time.

8 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State  
9 of Washington.

10  
11 DATED this 18<sup>th</sup> day of March, 2021

12  
13 PARKE GORDON LLC

14 By:



15 Tamara Baldwin, WSBA # 50077  
16 Attorney for Plaintiff

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SUMMONS

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**MAR 18 2021**

**MICHAEL J. KILLIAN  
FRANKLIN COUNTY CLERK**

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF FRANKLIN**

Karen Elaine Gard,

Case No.: **21 250126 11**

Plaintiff,

v.

**COMPLAINT**

Greyhound Lines Inc.,

Defendant.

COMES NOW the above-named plaintiff, Karen Elaine Gard, by and through her undersigned attorney of record, and for cause of action against Defendant, complains and alleges as follows:

**I. IDENTIFICATION OF PARTIES AND JURISDICTION**

1.1 At all times relevant hereto Plaintiff Karen Elaine Gard was a resident of York County, Maine.

1.2 Defendant, Greyhound Lines, Inc., a foreign profit corporation incorporated in Delaware, and at all times relevant hereto has been doing business in the state of Washington including Franklin County under UBI 601 033 019.

1.3 The incident for which is the subject of this case herein occurred in Pasco, Franklin County, Washington.

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1.4 This Court has jurisdiction over this action and venue is proper in Franklin County, Washington.

## II. DUTY OF CARE

2.1 Defendant owed a duty of care to Plaintiff to: maintain safety for passengers exiting its bus, operate Defendant's vehicle in a reasonable and safe manner, to ensure the safety of passengers.

## III. BREACH OF DUTY

3.1 On or about June 3, 2019, Plaintiff was a passenger on the Greyhound Bus from Portland, Oregon to Pasco, Washington. Plaintiff's "Schedule Number" was GLI6912. She arrived in Pasco at about 4:30 pm. At that time, Plaintiff was exiting the bus when she fell from the bus to the ground.

3.2 Defendant was negligent in one or more of the following ways:

- a. In failing to ensure the safety of its passengers;
- b. In failing to provide adequate egress from its bus;
- c. In such other negligent manner to be proven to the trier of fact at trial.

## III. INJURIES

4.1 As a direct and proximate result of Defendant's negligence alleged herein, Plaintiff suffered bodily and emotional injuries in an amount to be proven at the time of trial.

## IV. DAMAGES

5.1 As a direct and proximate result of Defendant's negligence, Plaintiff has suffered bodily and emotional injuries, some of which may be permanent and may result in residual permanent disability which may cause pain, suffering, emotional anguish, loss of ability and capacity to enjoy life, health care expenses, possible loss of earnings over her

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1 lifetime, and other general and special damages, economic and non-economic. Plaintiff is  
2 entitled to be compensated for her injuries, incurred past and future physical, mental pain,  
3 disability, and medical expenses, in such amounts to be proven at the time of trial herein.

4 WHEREFORE, Plaintiff respectfully pray for judgment against Defendant as follows:

5 **V. RELIEF SOUGHT**

6 6.1 For an award of damages compensating Plaintiff for past and future general  
7 and special damages, economic and non-economic, including pre-judgment interest on  
8 Plaintiff's expenses as are allowed by law, in an amount to be proven at the time of trial in  
9 this matter.

10 6.2 For such other and further relief as the Court deems just, equitable and proper.  
11  
12  
13

14 DATED this March 18, 2021.

15 PARKE GORDON LLC

16 By: 

17 Tamara Baldwin, WSBA # 50077  
18 Attorney for Plaintiff  
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COMPLAINT

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